

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

IN RE:

THOMAS G. DAVIDSON

Case No.: 12-32765-KRH  
Chapter 13

Debtor

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ENTRUST FINANCIAL CREDIT UNION

Movant

v.

THOMAS G. DAVIDSON

Debtor/Respondent

**RESPONSE TO NOTICE OF DEFAULT**

COMES NOW Thomas G. Davidson, (Debtor/Respondent), by counsel, and responds as follows;

1. Debtor/Respondent does not admit or deny that he is currently in default under the terms of the Consent Order entered on January 29, 2013, with Movant, Entrust Financial Credit Union.

2. Debtor/Respondent requests that if the Court finds non-compliance with the terms of the Consent Order that the Court grant a reasonable time to cure any default as the loss of the property would be detrimental to the effective reorganization of Debtors' financial plan and loss of said property would present an undo hardship.

Yvonne Cochran, VSB #26015  
COCHRAN LAW FIRM, P.C.  
4509 West Broad Street  
Richmond, Virginia 23230  
(804) 358-2222

WHEREFORE, Debtor/Respondent asks that Movant's Notice of Default be withdrawn or dismissed, that a hearing be set in this matter and that Debtor have such other relief as the Court deems just and proper.

THOMAS G. DAVIDSON  
By Counsel

COCHRAN LAW FIRM, P.C.  
4509 West Broad Street  
Richmond, VA 23230  
(804) 358-2222

By: /s/ Yvonne Cochran  
Yvonne Cochran, VSB #26015  
*Counsel for Debtor*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 18<sup>th</sup> day of March, 2013 the following person(s) were served electronically via the CM/ECF system, or were mailed a copy of the foregoing Answer by first class mail, postage prepaid:

Edward S. Whitlock, III, Esq.  
Lafayette, Ayers & Whitlock, PLC  
10160 Staples Mill Road, #105  
Glen Allen, VA 23060  
*Counsel for Movant*

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/s/ Yvonne Cochran  
Yvonne Cochran, VSB #26015